

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

RIKI PAUL JOHNSON,

Plaintiff,

v.

ASHLEY ELIZABETH FLIEHR a/k/a  
ASHLEY FLAIR, a/k/a CHARLOTTE  
FLAIR, RICHARD MORGAN FLIEHR  
a/k/a RIC FLAIR, a/k/a “NATURE BOY”  
FLAIR, BRIAN SHIELDS, and WORLD  
WRESTLING ENTERTAINMENT, INC.  
d/b/a the “WWE”,

Defendants.

**CASE NO. 3:18-cv-00565-GCM**

**JOINT MOTION FOR EXTENSION OF TIME TO ANSWER, PLEAD  
OR OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT**

Defendants Ashley Elizabeth Fliehr a/k/a Charlotte Flair, World Wrestling Entertainment, Inc. d/b/a “WWE”, Richard Morgan Fliehr a/k/a Ric Flair a/k/a “Nature Boy” Flair and Brian Shields (together, the “Defendants”), pursuant to Rule 6 of the Federal Rules of Civil Procedure, respectfully move the Court for an additional extension of time within which to answer, plead or otherwise respond to Plaintiff’s Complaint.

Plaintiff Riki Paul Johnson, by and through his counsel Trey Lindley, consents to and joins in Defendants’ motion for extension of time.

In support of this motion, the Defendants and Plaintiff show the Court the following:

1. For good cause shown, the Defendants each sought an extension of time to respond to the Complaint in this action (Doc. Nos. 9, 10, 11 and 13 ), and the Court on November 5, 2018

granted those motions and extended the Defendants' time to respond to the Complaint until December 3, 2018. (Text-Only Orders dated November 5, 2018).

2. On November 26, 2018, Charlotte attorney Trey Lindley informed counsel for the Defendants that he intended to file a Notice of Appearance on behalf of Plaintiff and that he intended to file an Amended Complaint on Plaintiff's behalf.

3. Mr. Lindley filed his Notice of Appearance as counsel of record for Plaintiff in this case on November 29, 2018. (Doc. No. 17).

4. Mr. Lindley has informed counsel for Defendants that he was formally engaged by Plaintiff on November 25, 2018, and needs time to fully review the factual background related to Plaintiff's claims and to draft, finalize and file an Amended Complaint. He also has informed counsel for Defendants that due to a scheduled out of state trip in early December, the press of other legal matters, and the subsequent Christmas holiday period, he would need until January 11, 2019 to file the contemplated Amended Complaint.

5. Mr. Lindley has requested that, in the interests of judicial economy and to avoid unnecessary effort and expense to Plaintiff and the Defendants, the Defendants refrain from filing responses to the current Complaint, thereby providing Plaintiff an opportunity to file an Amended Complaint without moving the Court for leave to amend the Complaint.

6. Mr. Lindley has committed to filing any Amended Complaint on or before January 11, 2019.

7. Based upon Mr. Lindley's representations, and upon Plaintiff's consent to this motion for extension of time, Defendants respectfully request that the Court grant the Defendants an extension of time until January 18, 2019 in which to respond to the existing Complaint should Plaintiff fail to file an Amended Complaint on or before January 11, 2019.

8. In the event Plaintiff files a timely Amended Complaint, Defendants request that they be granted thirty (30) days from the date of any such filing to respond to the Amended Complaint.

9. Plaintiff consents to such extensions of time to respond to any such Amended Complaint, or to the existing Complaint in the event no Amended Complaint is filed, and joins in Defendants' Motion for Extension of Time.

10. This motion is made for good cause and not for purposes of delay.

WHEREFORE, Defendants Ashley Elizabeth Fliehr a/k/a Charlotte Flair, World Wrestling Entertainment, Inc. d/b/a "WWE," Richard Morgan Fliehr a/k/a Ric Flair a/k/a "Nature Boy" Flair and Brian Shields respectfully request that the Court: (1) grant them an extension of time to answer, plead or otherwise respond to the existing Complaint up to and including January 18, 2019, should no Amended Complaint be timely filed, and (2) grant them an extension of time to answer, plead or otherwise respond to any Amended Complaint timely filed by Plaintiff that would make their responses due on or before thirty (30) days after the filing of any such Amended Complaint.

This the 29<sup>th</sup> day of November, 2018.

/s/Jonathan E. Buchan

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Natalie D. Potter, NC State Bar No. 34574  
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/s/C. Amanda Martin

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Consented to and joined in by:

/s/Trey Lindley

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## **CERTIFICATE OF SERVICE**

I hereby certify I electronically filed this above Joint Motion for Extension of Time to Answer, Plead or Otherwise Respond to Plaintiff's Complaint through the CM/ECF system, which will send a notice of electronic filing to:

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Attorney for Plaintiff

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Attorney for Defendant Ashley Elizabeth  
Flierh a/k/a Charlotte Flair

This the 29<sup>th</sup> of November, 2018.

/s/Jonathan E. Buchan  
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Attorney for Defendant World Wrestling  
Entertainment, Inc., d/b/a "WWE", Brian  
Shields and Richard Morgan Fliehr a/k/a Ric  
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